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8 Attorneys for Defendant
9 EMPLOYEE EQUITY ADMINISTRATION, INC., a
10 California corporation, doing business as WESTLINE
11 MEDICAL MANAGEMENT BROOKVUE CARE
12 CENTER, OAKLAND CARE CENTER,
13 ROUNSEVILLE REHABILITATION CENTER and
14 SUNRISE HEALTH CARE CENTER

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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11 SERVICE EMPLOYERS
12 INTERNATIONAL UNION NATIONAL
13 INDUSTRY PENSION FUND, ANDREW
14 STERN, Trustee, ROD BASHIR, Trustee,
15 CHARLES RIDGELL, Trustee,
16 SHARLEEN STEWART, Trustee, JAMES
BERG, Trustee, EDWARD J. MANKO,
Trustee, JOHN J. SHERIDAN, Trustee,
LARRY T. SMITH, Trustee, WILLIAM F.
STUHLBARG, Trustee,

CASE No. C 04 3900 JSW

STIPULATED JUDGMENT

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19 EMPLOYEE EQUITY
20 ADMINISTRATION, INC., a California
21 corporation, doing business as
22 WESTLINE MEDICAL
23 MANAGEMENT BROOKVUE CARE
CENTER, OAKLAND CARE CENTER,
ROUNSEVILLE REHABILITATION
CENTER and SUNRISE HEALTH
CARE CENTER,

Defendant.

EXHIBIT A

1 Defendants EMPLOYEE EQUITY ADMINISTRATION, INC., dba WESTLINE
 2 MEDICAL MANAGEMENT, BROOKVUE CARE CENTER, OAKLAND CARE CENTER,
 3 ROUNSEVILLE REHABILITATION CENTER and SUNRISE HEALTH CARE CENTER,
 4 stipulate to judgment as follows:
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6 1. Defendants were bound at all relevant times by a collective bargaining agreement
 7 with Local 250 SEIU to submit monthly reports of hours worked, and to make pension
 8 contributions at contractual rates to Plaintiff SEIU National Industry Pension Fund ("Fund") on
 9 behalf of employees at four nursing home facilities. Defendants failed for many months to fulfill
 10 these contractual obligations. The Court has jurisdiction over these claims under ERISA section
 11 502(e), 29 U.S.C. Section 1132(e).

12 2. Defendants are ordered to produce monthly contribution reports to plaintiff Fund
 13 for Rounsville Rehabilitation Center for the work months July through December 2001, as
 14 required pursuant to the terms of its collective bargaining agreement. The reports shall contain all
 15 contractually required information concerning covered hours of work by the employees of
 16 defendant. Defendants are ordered to provide Social Security numbers for employees listed in
 17 reports for Oakland Care Center. Because defendants have received notice of its breach of this
 18 obligation for many months, the reports shall be delivered to the office of plaintiffs' attorneys
 19 within fourteen (14) days from the date of entry of this Judgment.

20 3. The Court grants Judgment in favor of plaintiff and against defendants as to each
 21 hour for which contributions are delinquent as follows, under the authority of 29 U.S.C. Section
 22 1132(g)(2):

23 (a) All delinquent contributions;
 24 (b) Interest at the Fund rate of 10% simple interest per annum;
 25 (c) Liquidated damages on delinquent contributions in an amount equal to the
 26 great of:

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EXHIBIT A

1 This Judgment, based on contractually required self-reporting by defendant, shall not bar plaintiff
2 to conduct its periodic compliance testing in the future of the accuracy of defendants self-
3 reporting of amounts owed for the period covered by this Judgment under the terms of the Trust
4 Agreement of plaintiff Fund, and to bring a separate action based upon inaccurately under
5 reporting of hours and contributions owed by defendants.

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7 Dated: March 1, 2005

LONG & LEVIT LLP

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By:

Chip Cox

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Dated: March 3, 2005

SALTZMAN & JOHNSON LAW CORPORATION

By:

Philip M. Miller

Attorneys for Plaintiffs

SERVICE EMPLOYERS

INTERNATIONAL UNION NATIONAL

INDUSTRY PENSION FUND, ANDREW

STERN, Trustee, SHARLEEN STEWART,

Trustee, JAMES BERG, Trustee, EDWARD

J. MANKO, Trustee, JOHN J. SHERIDAN,

Trustee, LARRY T. SMITH, Trustee,

WILLIAM F. STUHLBARG, Trustee

Pursuant to Plaintiff's certification of Defendant's failure to provide the payments
pursuant to the Settlement Agreement, the Court HEREBY ENTERS this Stipulated
Judgment

Date: May 5, 2005

/s/ Jeffrey S. White

UNITED STATES DISTRICT JUDGE

EXHIBIT A

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